

**GREENBLATT, PIERCE, ENGLE, FUNT & FLORES, LLC**  
**BY: MICHAEL J. ENGLE, ESQUIRE**  
**ID NO. 85576**  
**123 SOUTH BROAD STREET, SUITE 2500**  
**PHILADELPHIA, PA 19109**  
**(215) 985-4275**

**ATTORNEY FOR DEFENDANT**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>UNITED STATES OF AMERICA</b>	<b>:</b>	
	<b>:</b>	
<b>vs.</b>	<b>:</b>	<b>CRIMINAL NO. 14-149</b>
	<b>:</b>	
<b>ERIK VON KIEL</b>	<b>:</b>	
	<b>:</b>	

**O R D E R**

**AND NOW**, to wit this \_\_\_\_\_ day of \_\_\_\_\_, 2014, upon consideration of the Defendant's Motion for Continuance of Trial, and after response by the Government, it is hereby **ORDERED, ADJUDGED, AND DECREED** that the Defendant's Motion for Continuance of Trial is GRANTED based upon the Court's finding that the ends of justice served by the granting of this continuance outweigh the best interests of the public and the Defendant in a speedy trial, pursuant to 18 U.S.C. § 3161 (h) (8) (A)-(B); and it is ORDERED that Defendant's Trial shall be re-scheduled for: \_\_\_\_\_.

**BY THE COURT:**

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**HONORABLE JEFFREY L. SCHMEHL**  
United States District Court Judge

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**UNITED STATES OF AMERICA** :  
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:  
**vs.** : **CRIMINAL NO. 14-149**  
:  
**ERIK VON KIEL** :

**DEFENDANT'S MOTION FOR CONTINUANCE OF TRIAL**

**TO THE HONORABLE, THE JUDGE OF SAID COURT:**

Defendant, ERIK VON KIEL, by and through his counsel, MICHAEL J. ENGLE, ESQUIRE hereby moves this Honorable Court to GRANT the Defendant's Motion for Continuance of Trial, and asserts the following reasons therefore:

1. Trial in the instant matter is currently scheduled for June 23, 2014.
2. Defense counsel has recently received discovery from prior counsel. Defense counsel will require time to review the discovery, file pre-trial motions, prepare for trial and/or explore the possibility of a non-trial disposition in this case.
3. Counsel for the Defendant requires additional time to fully investigate this matter and resolve whether the Defendant wishes to proceed by way of a trial by jury or a non-trial disposition.
4. In order to ensure that the Defendant's constitutional right to a fair trial is protected, the Defense requires additional time to prepare this case.

5. The Defendant respectfully submits that the ends of justice served by the granting of this continuance outweigh the best interests of the public and the Defendant in a speedy trial, pursuant to 18 U.S.C. § 3161 (h) (8) (A)-(B).

WHEREFORE, the Defendant, ERIK VON KIEL, respectfully requests that this Honorable Court grant the Motion for Continuance of Trial.

RESPECTFULLY SUBMITTED:

SIGNATURE CODE: MJE5849  
MICHAEL J. ENGLE, ESQUIRE  
ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I, MICHAEL J. ENGLE, ESQUIRE, HEREBY CERTIFY THAT I HAVE  
FORWARDED BY ELECTRONIC FILING, A TRUE AND CORRECT COPY OF THE  
FOREGOING MOTION FOR CONTINUANCE OF TRIAL TO THE FOLLOWING  
PERSONS:

HONORABLE JEFFREY L. SCHMEHL  
CHAMBERS  
U.S. COURTHOUSE  
601 MARKET STREET  
PHILADELPHIA, PA 19106

MARK B. DUBNOFF, AUSA  
615 CHESTNUT STREET  
SUITE 1250  
PHILADELPHIA, PA 19106

SIGNATURE CODE: MJE5849  
MICHAEL J. ENGLE, ESQUIRE  
ATTORNEY FOR DEFENDANT

DATED: MAY 18, 2014